## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA DUBLIN DIVISION

JAMES KODEKT CKAIG.	<b>JAMES</b>	ROBERT	CRAIG.
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Plaintiff,

Civil Action File 3:25-cv-50-DHB-BKE

v.

CORECIVIC, INC., et ano.,

Defendants.

## **DECLARATION OF JAMES ROBERT CRAIG**

- I, James Robert Craig, declare as follows:
- 1. My name is James Robert Craig, and I go by "Robert." I am the plaintiff in the above-styled case. I am over the age of 18, of sound mind and competent, and have personal knowledge of the facts set forth herein.
- 2. I am the father of Benjamin Craig, the decedent in this case, who died while he was incarcerated at Wheeler Correctional Facility in Georgia. At the time of his death, he was unmarried and did not have any children.
- 3. Benjamin was born and raised in Powder Springs, Georgia, which is in Cobb County. For most of his life until his incarceration, Benjamin lived with me. While he was a child, he also lived with his older brother Robbie and mother Eliesha, all in the same home.

- 4. Around 20 years ago, in or about 2005, when Benjamin was about 17 years old, Eliesha abandoned me, Robbie, and Benjamin. She left us and we have not heard from her since. As of today's date, I have not spoken to Eliesha since she left; I do not know where she lives, or if she is even alive.
- 5. While Eliesha lived with us, she was abusive to me and my sons. She yelled, screamed, and was physically violent. Benjamin and Robbie told me that while I was at work on the night shift or sleeping after Eliesha would sometimes throw ashtrays at them and would hit them in the back of their head with her cane.
- 6. While Eliesha lived with us, she did not care for Benjamin (or his brother Robbie). She did not help Benjamin (or his brother) with school, meals, or any other areas of development, including playing with them as children. She also did not contribute financially to the household or her children. She was essentially an absentee parent.
- 7. Once she abandoned us in or around 2005, she did not pay any child support for Benjamin or provide financially in any way. While living with us and after she left, Eliesha did not attempt to establish any meaningful relationship with Benjamin.
- 8. I understand that the probate lawyer who attempted to locate Eliesha could not. I also understand that because of this the probate court tried to give notice to Eliesha of the probate proceedings and Benjamin's death by publication.

9. I have not heard from Eliesha, or anyone on her behalf, and it is my understanding that she has not filed anything with the probate court. As I mentioned above, we do not even know whether Eliesha is still alive, as she was chronically ill when she abandoned us in 2005.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 20, 2025 in Cobb County, George

James Robert Craig